

# **EXHIBIT 7**

## BAKER BOTTS LLP

THE WARNER  
1299 PENNSYLVANIA AVE., NW  
WASHINGTON, D.C.  
20004-2400

TEL +1 202.639.7700  
FAX +1 202.639.7890  
www.bakerbotts.com

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March 10, 2011

William H. Jeffress, Jr.  
TEL +1 202-639-7751  
FAX +1 202-585-1087  
william.jeffress@bakerbotts.com

Terry Collingsworth  
Conrad & Scherer  
1156 15th St NW, Suite 502  
Washington, DC 20005

Re: Claudia Balcerio v. Drummond

Dear Terry:

This will respond to your letter of February 28 regarding prison depositions in Colombia. I do not find in your letter anything not addressed in my letter of February 23 other than certain unfounded accusations, to which I will respond as follows.

Your statement that Charris, El Tigre and Samario have all been threatened with death and offered bribes to keep them from testifying against Drummond is a highly important and troubling fact if true. We have no information whatsoever about such threats or offers (other than what we have read in Duarte's declaration), and based on our experience with similar claims by other witnesses in nine years of this litigation, we have reason to doubt their credibility. We request that you advise us promptly of the identity of each person who has made such a threat or offer, the nature of the threat or offer, and when, where and to whom it was made. We also assume that any such plainly criminal conduct has been reported to the proper authorities in Colombia. If that has not been done, we strongly urge you to ensure that it is done. Please provide us with copies of the reports that have been or will be made.

Regarding our "objectives," we seek not to prevent testimony by any witness but to ensure a level playing field where witnesses known to have critical testimony are available to both sides on an equal footing. We recognize the difficulties in accomplishing that goal, but that is the nature of a lawsuit where the events occurred and the witnesses are located in a foreign country, and we are doing the best we can to achieve the goal.

**BAKER BOTTS** LLP


Terry Collingsworth

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Finally, plaintiffs' constant suggestion that the Colombian government, including its law enforcement authorities, are somehow allied with defendants in opposition to plaintiffs is baseless and untrue. You have on many occasions attributed the availability of testimony against Drummond by Colombian prisoners to the Justice and Peace Process of the Colombian government. Moreover Colombian law enforcement authorities have prosecuted and imprisoned nearly a dozen persons responsible for the murders by the AUC of former Drummond union leaders. These facts, among others, obviously contradict your repeated suggestions that the authorities in Colombia are weak or somehow aligned with Drummond.

Sincerely,



William H. Jeffress, Jr.